

IN THE  
**United States District Court for the  
Eastern District of North Carolina**

Southern Division

ANDREW U. D. STRAW, <i>Plaintiff,</i>	)	Case#: 7:23-cv-162-BO-BM
	)	
	)	Hon. Terrence Boyle
v.	)	Judge Presiding
	)	Hon. Brian Meyers
UNITED STATES OF AMERICA, <i>Defendant.</i>	)	Magistrate Judge
	)	
	)	JURY TRIAL DEMANDED

**AFFIDAVIT TO SUPPORT INJUNCTION AND SUMMARY JUDGMENT**

COMES NOW, *pro se Plaintiff* ANDREW U. D. STRAW (hereinafter "Plaintiff"), individually, hereby depose as follows as a Camp LeJeune toxic water victim:

**FACTS**

1. I was using the Camp LeJeune base *in utero* and as an infant for **19 months** while my father was stationed at MCAS New River, part of Camp LeJeune, from December 19, 1968, to July 24, 1970.
2. The second requirement is a harm that can be associated with the Camp LeJeune water toxins. PCE, one of the Camp LeJeune toxins, has been associated in medical literature with bipolar disorder:

The study found evidence that **early-life exposure to PCE-contaminated drinking water** has long-term neurotoxic effects. The **strongest associations were seen with** illicit drug use, **bipolar disorder** \* \* \*

<https://annalsofglobalhealth.org/articles/abstract/10.1016/j.aogh.2016.01.013/>

3. Citation: Aschengrau, A., Janulewicz, P.A., White, R.F., Vieira, V.M., Gallagher, L.G., Getz, K.D., Webster, T.F. and Ozonoff, D.M., 2016. "Long-term Neurotoxic Effects of Early-life Exposure to Tetrachloroethylene-contaminated Drinking Water." *Annals of Global Health*, 82(1), pp.169–179. DOI: <http://doi.org/10.1016/j.aogh.2016.01.013>
4. I have been diagnosed with bipolar disorder multiple times and admitted to mental hospitals about 10x for this illness. It represents **infant brain injury** and **damaged my law career**. Those are my two counts, two types of injury (both **property damage to my law licenses** and personal injury, **infant brain injury, incurable**). My second count will be added in May 2023 when the U.S. Navy JAG claim filed 11/3/2022 ripens.
5. My supporting exhibits attached to the summary judgment motion show the requisite base exposure time of over 30 days and my doctor letters demonstrate I have **bipolar**, which is associated with Camp LeJeune's PCE.
6. The bipolar caused me to have a higher risk of car accidents by 66% and I was in a near-death car accident on the way to the Indiana Supreme Court to work, but was denied full recompense as a crime victim and Workers Compensation.
7. Thus, I have proven the time on base and an appropriate injury, with proofs.
8. This document is therefore an affidavit to support the injunction motion to request health coverage (**\$4,000 per month payments**) and the summary judgment motion for compensation based on Count I of Dkt. 1, and done to introduce the supporting exhibits.

9. The 8 exhibits are all true and correct copies on penalty of perjury.

10. There is evidence that **\$50,000,000 is appropriate** for an infant brain injury:

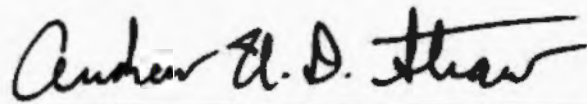
<https://www.chicagolawbulletin.com/jury-awards-50m-to-family-of-child-after-brain-injury-20181010>

11. My demand is for **\$51,000,000**.

Further, *affiant* sayeth not.

I, Andrew U. D. Straw, verify that the above factual contentions and statements are true and correct to the best of my knowledge, information, and belief, on penalty of perjury. Signed: **April 3, 2023**.

Respectfully,



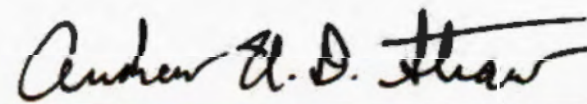
s/ ANDREW U. D. STRAW

712 H ST NE, PMB 92403  
Washington, D.C. 20002

#### CERTIFICATE OF SERVICE

I, Andrew U. D. Straw, certify that on **April 3, 2023**, I sent this AFFIDAVIT via U.S. Mail to the Clerk of Court. I also served it via email to: [elizabeth.k.platt@usdoj.gov](mailto:elizabeth.k.platt@usdoj.gov) and [haroon.anwar@usdoj.gov](mailto:haroon.anwar@usdoj.gov), U.S. DOJ attorneys who made their appearances in this lawsuit on **March 24, 2023**. CM/ECF scans all paper documents and serves them once stamped, so these attorneys will be served that way also.

Respectfully submitted,



s/ ANDREW U. D. STRAW

*Pro Se Plaintiff*

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